

Ricardo H Hinojosa, Chief Judge
US Southern District of Texas
1701 W Business Hwy 83 Rm 1028 78501
PO Box 5059, McAllen TX 78502

UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED
SEP 22 2014

David J. Bradley, Clerk of Court

Re: PEREZ v PERRY 5:11 cv 360-OLG-JES-XR.

LET THE VOTERS ENDORSE & ENABLE A LIMITED VOTING BALLOT.
SEE RODRIGUEZ v HARRIS CO 4:11 cv 2907-VDG USCA 13-20491.
I lack and want docket sheets for 13-20491.
Docs 127 thru 129 in 4:11 cv 2907 are letters from me.

See HUNTER v UNDERWOOD (ON ALABAMA).

CALERA AL elects six city councilmen by limited voting.

GUIN AL has elected seven city councilmen by cumulative voting since about 1987.

PEORIA IL has elected five aldermen by cumulative voting and five by wards since 1991.

I am the interested party pro se with notice (I got orders) in VEASEY v PERRY 2:13 cv 193 suggesting a limited voting 2nd ballot for the Texas State House with candidates paying a filing deposit to get on the limited voting ballot in their own and 2-4 add'l districts. 20+ docs are letters from me.

Trial started Sep 2 in Corpus Christi with follow up in San Antonio PEREZ v PERRY 5:11 cv 360-OLG-JES-XR.

Voters who like the party primary winners may omit the limited voting ballot but those who don't may omit the general election.

Robert M Allensworth B14522
BMRCC 251 N IL 37 S
Ina IL 62846 2419

H283, and the alterations made to HD 90 in Plan H358 do not afford individual plaintiffs and organizational plaintiffs' members an equal opportunity to participate in the political process and to elect representatives of their choice, and denies individual plaintiffs and organizational plaintiff's members the right to vote in elections without distinction of race, color or previous condition of servitude in violation of 42 U.S.C. Section 1973.

VII.
REQUEST FOR THREE JUDGE COURT

87. Plaintiffs request a three-judge trial court pursuant to 28 U.S.C. Section 2284.

VIII.
ATTORNEYS' FEES

88. In accordance with 42 U.S.C. Sections 1973-1(e) and 1988, Plaintiffs are entitled to recover reasonable attorney's fees, expenses and costs.

IX.
PRAYER

89. WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Court:
- (a) assume jurisdiction of this action and request a three-judge panel pursuant to 28 U.S.C. Section 2284;
 - (b) issue a declaratory judgment finding that Plans C185, H283, and the alterations made to HD 90 in Plan H358 illegally and unconstitutionally dilute the voting strength of Latino voters in Texas, violate section 2 of the Voting Rights Act and the 14th and 15th Amendments to the U.S. Constitution, and are unlawful, null and void;
 - (c) permanently enjoin Defendants from calling, holding, supervising or certifying any elections under Plans C185, H283, and H358. Plaintiffs have no adequate remedy at law other than the judicial relief sought herein, and unless the Defendants are enjoined from using Plans C185, H283 and H358, individual plaintiffs and

organizational plaintiff's members will be irreparably harmed by the continued violation of their statutory and constitutional rights;

- (d) pursuant to 42 U.S.C. 1973a(c), issue an order requiring Texas to preclear its election changes during the ten-year period following the issuance of such order;
- (e) set a reasonable deadline for state authorities to enact or adopt redistricting plans for congressional and Texas House districts that do not dilute, cancel out or minimize the voting strength of Latino voters;
- (f) if state authorities fail to enact or adopt valid redistricting plans by the Court's deadline, order new redistricting plans for congressional and Texas House districts that do not dilute, cancel out or minimize the voting strength of Latino voters;
- (g) adjudge all costs against Defendants, including reasonable attorneys fees and costs;
- (h) retain jurisdiction to render any and all further orders that this Court may;
- (i) grant any and all further relief to which Plaintiffs may show themselves to be entitled.

DATED: September 9, 2013

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

/s/ Nina Perales

Nina Perales

Texas Bar No. 24005046

Marisa Bono

Texas Bar No. 24052874

Karolina Lyznik

Texas Bar No. 24083431

110 Broadway, Suite 300

San Antonio, TX 78205

(210) 224-5476

FAX (210) 224-5382

1 which we did not deal with in the Section 5 case.

2 And so we would proffer to this Court that we should
3 proceed along the lines of the United States and --

4 **THE COURT:** Okay.

5 **MR. HAYGOOD:** -- I would ask for a trial that would
6 commence in 2015 and a longer discovery schedule to allow for
7 the full exposition of the evidence we need to amass in this
8 case.

9 **THE COURT:** All right. Mr. Rosenberg?

10 **MR. ROSENBERG:** Yes. On behalf of Texas NAACP and
11 MALC, we agree with the comments just expressed by Mr. Haygood.
12 I would add that not only are -- is there going to be a lot
13 more work done for the matching of the databases but the fact
14 discovery is going to be much more extensive mainly because we
15 were pressed -- I was also involved in the Senate 5 litigation
16 and we had 90 days to do everything and there were things that
17 we wanted to do with respect to discovery of their motions to
18 -- for the purpose that we did not do and were not able to do
19 in that short period of time and I think we're going to need an
20 extensive amount of discovery that's going to have to be
21 happening.

22 **THE COURT:** All right. Ms. Westfall?

23 **MS. WESTFALL:** Yes, your Honor. I would like to
24 reiterate some of the points made and just provide additional
25 information about what happened in the previous action. We

PMRCC 2 2 11 37 S
Ine IL 6284

SEP 22 2014

RECEIVED
RHH

THIS CORRESPONDENCE
IS FROM AN INMATE OF
THE ILLINOIS
DEPARTMENT OF
CORRECTIONS

Ricardo H. Hinojosa, Chief Judge

US Southern District of Texas

1701 W Business Hwy 83 Rm 1028 78501

PO BOX 5059

McAllen TX 78501



7850235059 B042

Screened by US Marshals